

## **EVALUATION REPORT**

**XTRA OIL COMPANY  
1701 Park Street  
Alameda, CA 94501  
GDF#30  
Application #6987**

### **BACKGROUND**

Xtra Oil Company (facility) located at 1701 Park Street, Alameda, CA submitted this application to increase annual gasoline throughput. No equipment modifications are being proposed at this time. The facility is currently conditioned to 3.8 million gal/year throughput limit (Condition #10536). The baseline for this facility is 2.4 million gal/yr under A/N23404.

The facility operates the following equipment: Three (3) underground tanks (2 – 15,000 gallon gas tanks and 1 – 12,000 gallon diesel tank), six (6) dispensers equipped with twelve (12) triple product nozzles. The facility is equipped with Phase I Two Point system and Phase II Vacuum Assist system.

### **EMISSION CALCULATIONS**

Emission factors are taken from the Gasoline Service Station Industrywide Risk Assessment Guidelines developed by the California Air Pollution Officers Association's (CAPCOA) Toxics Committee. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput limit of 4.9 million gal/yr is based on the results of the Air Toxics Risk Screening.

<u>Increase:</u>	(1.1 million gal/yr)(1.27 lb/1000 gal)	= 1,397 lb/yr
		= 3.8 lb/day
		= .7 TPY

<u>Total emissions:</u>	(4.9 million gal/yr)(1.27 lb/1000 gal)	= 6,223 lb/yr
		= 17 lb/day
		= 3.1 TPY

### **TOXIC RISK SCREENING ANALYSIS**

The toxic air contaminant of concern at this site is benzene, a carcinogen. Benzene is emitted during gasoline dispensing operations. The estimated increase in emission rate and annual emissions of benzene are greater than the toxic trigger level (6.7 lb/yr), therefore an Air Toxics Risk Screening is required. According to the risk screening analysis, the maximum cancer risk for the nearest residents is 10 chances in a million and the risk at the school is 0.04 chances in a million. In accordance with BAAQMD Risk Management Policy, these risk values are acceptable and the facility passes the screening assessment provided Toxics Best Available Control (TBACT) is used. TBACT for gas stations consists of CARB-certified equipment. All equipment at this station meets this requirement.

## COMPLIANCE

The facility shall comply with the following requirements:

### A. Permits – General Requirements, Regulation 2, Rule 1

The facility is located within 1000 feet of the outer boundary of Island High School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned school and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

### B. Permits – New Source Review, Regulation 2, Rule 2

1. **Best Available Control Technology (BACT), Regulation 2-2-301:** The facility has the potential to emit more than 10 lbs of VOC per single day and this triggers the BACT requirements of Regulation 2-2-301. BACT for GDFs is compliance with Regulation 8, Rule 7 and conformance with California Air Resources Board (CARB)/BAAQMD approved design and operation. The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders G-70-97A and G-70-150.
2. **Offsets, Regulation 2-2-302:** Because the total facility emissions will be less than 15 tons per year, the facility is not required to provide offsets.
3. **California Environmental Quality ACT (CEQA), Regulation 2-1-311:** This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3 and therefore is not discretionary as defined by CEQA.

### C. Fees – Regulation 3

All applicable fees have been paid.

## RECOMMENDATION

I recommend that a Permit to Operate be issued to Xtra Oil Company, located at 1701 Park Street, Alameda, CA., with a gasoline throughput limit of 4.9 million gal/yr (Condition #11963).

by: \_\_\_\_\_  
Lorna Santiago  
AQ Permit Technician

Date: \_\_\_\_\_